

Hearing Date: July 30, 2015
Reply Deadline: July 20, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Case No. 12-12020 (MG) (Ch. 11)
(Jointly Administered)

In re:

RESCAP LIQUIDATING TRUST
MORTGAGE PURCHASE LITIGATION

Adv. Proc. No. 14-07900 (MG)

This document relates to:

Residential Funding Co. v. HSBC Mortg. Corp.
(USA), Adv. Proc. No. 14-01915 (MG)

Residential Funding Co. v. UBS Real Estate
Secs., Inc., Adv. Proc. No. 14-01926 (MG)

ResCap Liquidating Trust v. Summit Fin.
Mortg. LLC, Adv. Proc. No. 14-01996 (MG)

ResCap Liquidating Trust v. Mortg. Investors
Grp., Inc., Adv. Proc. No. 14-02004 (MG)

Residential Funding Co. v. SunTrust Mortg. Inc.,
Adv. Proc. No. 13-1820 (MG)

**PAULSON & CO. INC.'S RESPONSE TO DEFENDANTS'
MOTION TO MODIFY ORDER APPOINTING MEDIATOR**

Paulson & Co. Inc. ("Paulson"), which participated as a claimant in the confidential global mediation that is the subject of Defendants' Motion to Modify Order Appointing Mediator filed on June 3, 2015 in *In Re Rescap Liquidating Trust Mortgage Purchase Litigation*,

Adv. Proc. No. 14-07900-mg (Dkt. 85), hereby opposes the Motion, and urges the Court to deny the Motion and any discovery of the mediation communications at issue in the Motion, for substantially the reasons set forth in the July 2, 2015 memorandum of law filed by the ResCap Liquidating Trust and Residential Funding Company in response to the Motion (Dkt. 91; Case No. 12-12020, Dkt. 8834). Paulson reserves all rights to be further heard on this motion as appropriate.

Dated: New York, New York
July 6, 2015

Respectfully submitted,

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